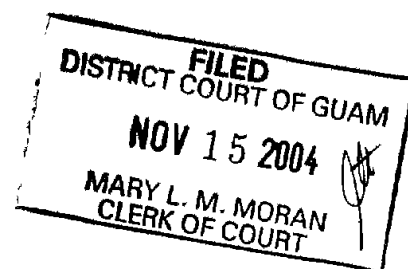


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(25)

Attorneys for Guam Election Commission
and Gerald A. Taitano

IN THE DISTRICT COURT OF GUAM

JAY MERRILL, etc., et. al.,)	CIVIL CASE NO. 04-00046
)	
Plaintiff,)	
)	
v.)	MOTION FOR PROTECTIVE
)	ORDER [FRCP 26(c)]
THE GUAM ELECTION COMMISSION;)	
GERALD A. TAITANO, in his individual)	
capacity and in his capacity as the)	
Executive Director of THE GUAM)	
ELECTION COMMISSION, I MINA')	
BENTE SIETE NA LIHESLATURAN)	
GUAHAN (The 27 th Guam Legislature);)	
FELIX P. CAMACHO, in his official)	
capacity as the GOVERNOR OF GUAM,)	
)	
Defendants.)	

TO: PLAINTIFF JAY MERRILL and his Attorney of Record, Dooley Roberts & Fowler LLP

Defendant I Mina' Bente Siete Na Liheslaturan Guahan
(The 27th Guam Legislature)
and its Attorneys of Record, Therese M. Terlaje, Esq.

//

Defendant Felix P. Camacho, Governor of Guam
and his Attorneys of Record, Shannon J. Taitano, Esq.
and the Law Offices of Calvo & Clark

Defendants, through the Office of the Attorney General

You are hereby advised that as soon as the matter can be heard at the District Court of Guam, 520 W. Soledad Avenue, 4th Floor, Hagåtña, Guam 96910, Defendants the Guam Election Commission ("GEC") and Gerald A. Taitano ("Mr. Taitano") will move the Court for an Order to stay the deposition of Mr. Taitano pending determination of proper legal representation for the GEC and Mr. Taitano, as more fully explained in the Memorandum of Points and Authorities filed contemporaneously herewith.

The motion will be based upon this Motion, the Memorandum of Points and Authorities filed herein, the papers, records, and files in this action, and upon such oral and documentary evidence as may be presented at the hearing of the Motion.

Dated this 15th day of November, 2004.

LAW OFFICES OF CESAR C. CABOT, P.C.
Attorneys for Guam Election Commission
and Gerald A. Taitano

By: David W. Hopkins
DAVID W. HOPKINS

DWH:lq
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